

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**CHMURA ECONOMICS &
ANALYTICS, LLC,**

**Plaintiff/Counterclaim
Defendant,**

Case No. 3:19-cv-813-REP

V.

RICHARD LOMBARDO,

**Defendant/Counterclaim
Plaintiff.**

**PLAINTIFF AND COUNTERCLAIM DEFENDANT’S MOTION *IN LIMINE* TO
EXCLUDE EVIDENCE AND ARGUMENT REGARDING DAMAGES
CALCULATIONS BASED ON AN OVERTIME PREMIUM RATE
OTHER THAN ONE-HALF THE REGULAR RATE OF PAY**

Plaintiff and Counterclaim Defendant Chmura Economics & Analytics, LLC (“Chmura” or “Plaintiff”), by counsel, files this Motion *in Limine* to Exclude Evidence and Argument Regarding Damages Calculations Based on an Overtime Premium Rate other Than One-Half the Regular Rate of Pay. For the reasons discussed in the accompanying Memorandum of Law, Chmura respectfully requests that the Court preclude Defendant and Counterclaim Plaintiff Richard Lombardo (“Lombardo” or “Defendant”) from introducing any evidence or argument that he is entitled to overtime compensation at a rate of time-and-one-half his regular rate of pay or at any rate other than one-half his regular rate of pay.

Dated: May 21, 2020

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of May, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send a notification of such filing (NEF) to all counsel of record.

/s/

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